To: DiBiasio, Karen@DTSC[Karen.DiBiasio@dtsc.ca.gov]

From: Dadap, Nathan C.

**Sent:** Wed 1/27/2016 12:48:16 AM

Subject: RE: Pechiney - PCB Soil Vapor question follow-up

Hi Karen,

Okay thank you, I'll let Patrick (our toxicologist) know that the SVE systems do not cover the Phase II areas. We are still in the process of reviewing the proposed land use covenants, and I have not reviewed the Planned Engineering Controls that you mention. The only engineering control I am aware of is the possible construction of a cap above PCB-contaminated soils up to 23 ppm. We would appreciate a copy of any revisions and additional measures that you send to Pechiney. At this point, we are not planning on taking additional steps to account for potential vapor intrusion of the PCBs at depth – but please let me know if you'd like to discuss it further with Patrick. I can setup a call.

Thanks! Nathan

Nathan Dadap U.S. EPA Region 9 Land Division, RCRA Branch 75 Hawthorne Street

San Francisco, CA 94105 Phone: (415) 972-3654

From: DiBiasio, Karen@DTSC [mailto:Karen.DiBiasio@dtsc.ca.gov]

**Sent:** Friday, January 22, 2016 5:42 PM

**To:** Dadap, Nathan C. <DADAP.NATHAN@EPA.GOV> **Subject:** RE: Pechiney - PCB Soil Vapor question follow-up

Hi Nathan,

Thanks for your reply. There is SVE in the Phase I area and in the Phases III/IV areas, but none in the Phase II area where PCBs up to 2000 mg/kg remain under either a subsurface concrete cover or an underground warning barrier. Has EPA reviewed the Proposed Engineering Controls for the Northern Parcel? I just reviewed it this week and am recommending revisions and additional measures to protect human health.

Happy Weekend!

Karen

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From: Dadap, Nathan C. [mailto:DADAP.NATHAN@EPA.GOV]

**Sent:** Friday, January 22, 2016 5:23 PM

To: DiBiasio, Karen@DTSC

Subject: Pechiney - PCB Soil Vapor question follow-up

Hi Karen,

Sorry for the late reply. I had an unexpected 4-day training come up last week.

Anyway, I wanted to let you know that I spoke with our toxicologist (Patrick Wilson) today regarding your question about whether we considered PCB volatilization exposures at Pechiney. The short answer: no, in formulating the cleanup levels at the site we most likely did not consider volatilization impacts from PCBs. (I say most likely since I've had trouble locating the record).

Since the remaining PCBs at depth (including soil at 2000 ppm and concrete at 4600 ppm) are covered by a concrete layer at 15 ft bgs and a second concrete slab at the surface, our concern over the potential for vapor intrusion is lessened. However one question did come up on our end: Is there any ongoing SVE for other contaminants and if so, does it overlap spatially with the PCB areas? That information might help eliminate any remaining concerns regarding PCB volatilization.

Please let me know if you'd like to discuss further and I can setup a call. Hope you have a nice weekend.

Thanks, Nathan

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